

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHELDON G. ADELSON,

Plaintiff,

v.

MOSHE HANANEL,

Defendant.

Docket No. 04CV10357RCL

PLAINTIFF'S "REVISED" INITIAL DISCLOSURE

Plaintiff pursuant to Fed.R.Civ.P. 26(a)(1) makes the following "revised" initial disclosure:

A. The following individuals are likely to have discoverable information:

1. Paul G. Roberts – The Interface Group, 300 First Avenue, Needham, MA 02494, (781) 707-2550. All matters relating to the agreements between the parties and that defendant had no role in any Macau transaction.

2. Sheldon G. Adelson, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, NV 89109, (702) 733-5500. All matters relating to each allegation of the complaint.

3. William Weidner, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, NV 89109, (702) 733-5500. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

107

4. David Friedman, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, NV 89109, (702) 733-5500. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

5. Stephen O'Connor, The Interface Group, 300 First Avenue, Needham, MA 02494, (781) 707-2550. All matters relating to the agreements between the parties and that defendant had no role in the granting of gambling licenses in Macau.

6. Bradley Stone, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, NV 89109, (702) 733-5500. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

7. Robert Goldstein, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, NV 89109, (702) 733-5500. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

8. Harry Miltenburger, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, NV 89109, (702) 733-5500. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

9. Leonard Adelson, The Interface Group, 300 First Avenue, Needham, MA 02494, (781) 707-2550. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

10. Jan Lochkenberg. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

11. Damian Hills, 41/F Edinburgh Tower, 15 Queens Road, Central Hong Kong. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

12. Irwin Chafetz, The Interface Group, 300 First Avenue, Needham, MA 02494, (781) 707-2550. All matters relating to the agreements between plaintiff and defendant.

13. Theodore Cutler, The Interface Group, 300 First Avenue, Needham, MA 02494, (781) 707-2550. All matters relating to the agreements between plaintiff and defendant.

14. Eric Ho, Macao. Mr. Ho will testify by deposition consistent with his Affidavit filed with the Court.

15. Richard Suen, Hong Kong. Mr. Suen is expected to testify by deposition that he is the cause of the Venetian obtaining a Macao gambling license and that Hananel had nothing to do with it.

16. Mr. Louis Sou, Macao. Mr. Sou has been identified by defendant as a significant witness in this case. In Hananel's deposition he claimed that plaintiff gave defendant Mr. Sou's business cards as proof that plaintiff met with Macao officials in March 2000. Plaintiff denies the meeting and ever presenting Mr. Sou's card to Hananel.

17. Christina Lam, Macao. Ms. Lam was the Arthur Anderson Company consultant who advised the Macao tender commission as referred to in Paragraph 11 of Eric Ho's affidavit.

18. Jorge Oliveira, Macao. Mr. Oliveira was head of the Tender Commission and is a government official. It is expected that he will testify concerning the awarding of gambling

concessions in Macao and whether anything defendant allegedly did or provided was of any benefit to plaintiff.

Plaintiff reserves the right to amend this list.

B. Documents.

1. Plaintiff's travel records.
2. All transactional documents relative to applications for a gambling license in Macau.
3. Copies of newspaper articles and press releases concerning defendant's claims against plaintiff.

C. Damages.

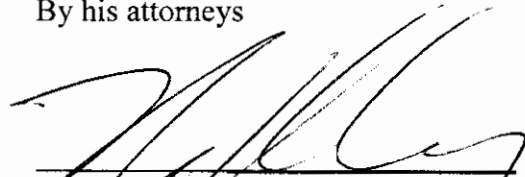
No computation of damages can yet be made.

D. Insurance.

There is none.

SHELDON G. ADELSON

By his attorneys

A handwritten signature in black ink, appearing to be 'F. Levy', written over a horizontal line.

Franklin H. Levy, B.B.O. No.: 297720

Albert P. Zabin, B.B.O. No.: 538380

DUANE MORRIS LLP

470 Atlantic Avenue, Suite 500

Boston, MA 02210

(617) 289-9200

Dated: December 29, 2005

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHELDON G. ADELSON,
Plaintiff,

v.

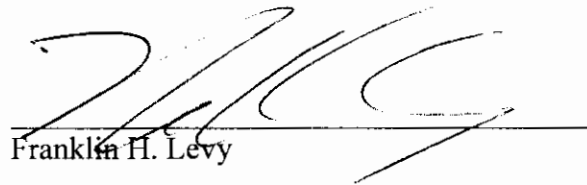
MOSHE HANANEL,
Defendant.

Docket No. 04CV10357RCL

CERTIFICATE OF SERVICE

I, Franklin H. Levy, do hereby certify that I served a copy of *Plaintiff's "Revised" Initial Disclosure* on all counsel of record listed below via hand delivery this 29th day of December 2005.

James A.G. Hamilton, Esquire
Perkins, Smith & Cohen, LLP
One Beacon Street
Boston, MA 02108


Franklin H. Levy

(107)